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August 23, 2021

**VIA ECF**

Honorable Andrew L. Carter, Jr.  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

USDC SDNY  
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Re: United States v. Yunseo Lee, et al  
Case No.: 20-cr-648 (ALC)

Dear Judge Carter:

We are the attorneys for Yunseo Lee in the above-referenced matter and hereby submit this letter request to modify her travel restrictions to SDNY and EDNY pursuant to the terms and conditions of her release, so that she could travel to the Catskills, NY, over the upcoming Labor Day weekend.

Ms. Lee was arrested and arraigned on August 6, 2020, on a complaint alleging that she violated U.S. export control laws while employed as a sales clerk at a New Jersey electronic components company. On December 1, 2020, Ms. Lee was indicted with her co-defendant on similar charges and the matter is pending discovery and potential plea negotiations. The matter is adjourned to August 31, 2021 for the parties' submission of a joint status letter.

Currently, she is released on a \$200,000 PRB bond, travel restrictions, surrender of her passport, and other standard conditions of release. During the pendency of her case, Ms. Lee has been in full compliance with the terms and conditions of her release, and the Court recently removed her curfew and GPS monitoring with the addition of two moral suasion cosigners to her bond.

We have conferred with Pretrial Services and they have no objections to our request to amend Ms. Lee's travel restrictions over the Labor Day weekend. We hereby request the Court so ordered the modification of Ms. Lee's travel restrictions for the Labor Day weekend to visit the Catskills.

Thank you for your consideration.

Respectfully submitted,

Hugh H. Mo

The application is **GRANTED**.  
So Ordered.

HHM: tw

  
8/30/21